

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Administration of the)	CC Docket No. 92-237
North American Numbering)	
Plan)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
North American Numbering Plan)	
Administration Technical Requirements)	
Document)	

REPLY COMMENTS OF TELCORDIA TECHNOLOGIES

Telcordia Technologies, Inc. (Telcordia) welcomes the opportunity to review the comments and provide reply comments to the Federal Communication Commission (FCC or Commission) on the technical requirements that will form the basis for a solicitation pursuant to Federal Acquisitions Regulations (FAR) for the North American Numbering Plan Administrator's (NANPA's) next term of administration.¹

Telcordia reiterates its position that information regarding intellectual property held by the current NANPA contractor must be made available to potential bidders for there to be fair and reasonable competition in this procurement. Several other commenters also note the need for the incumbent contractor to provide information with regard to the intellectual property acquired/developed by the contractor to fulfill its obligations as the NANPA. Hewlett Packard

¹ *The Wireline Competition Bureau Seeks Comment on the North American Numbering Plan Administrator Technical Requirements*, Public Notice, DA 02-1412 (rel. June 13, 2002).

states: “A complete listing of the transition related obligations of the current administrator should be available to potential bidders. In addition, an inventory of the databases, software, hardware and related equipment, and documentation that would transfer to a new administrator, as well as their locations, is important to the development of precise and realistic responses.”² Telcordia agrees that such a listing and inventory should be made available, but, as noted in its comments, believes that simply providing a listing and inventory does not go far enough. In order to determine what upgrades will be necessary to the inventory and systems that would transfer, significant additional information about those systems would need to be made available to bidders, including system and user documentation and ideally the source code for any customized system. NCS Pearson, another potential bidder, also notes the need for system specifications for the Code Administration System and other systems: “It is essential that all software, hardware or documentation involved in the transition be detailed in the NANPA Technical Requirements Document.”³ Telcordia agrees that such information needs to be provided to bidders as outlined in its Comments, which it will not duplicate here. It is also worth noting that not only have all potential commenting competitors to the incumbent NANPA noted the need for further information about the intellectual property that must be made available, but several service providers have also noted that information regarding what property will transfer should be added to the requirements document.⁴ As Telcordia noted in its comments, the industry through NBANC contributions paid the FCC-approved incumbent contractor for the

² *Comments of Hewlett Packard*, July 2, 2002 (p.3).

³ *Comments of NCS Pearson, Inc.*, July 2, 2002 (p. 2).

⁴ See *Comments of Verizon*, July 2, 2002, (p. 2), *Comments of SBC Communications, Inc.*, July 2, 2002 (p. 4).

development or acquisition of those assets, and Section 52.13(g) of the Commission's rules requires that property be made available.

Telcordia notes that several other commenters also state a need for clarification of the Change Management process. NeuStar, the incumbent contractor, and SBC both support NANPA providing an analysis of industry based changes after an Industry Numbering Committee issue reaches the initial closure stage⁵. Telcordia, as noted in its comments, supports this concept. Telcordia supports allowing the NANPA a reasonable period of time to perform cost and other impact assessments. Both Telcordia and NeuStar have requested the Commission to clarify the reference in Section 11.4 to Section 14.1 regarding changes in scope of work. It is worth noting that NeuStar assumed the section applied only to enterprise services while Telcordia did not; this reinforces the need for the Commission to clarify this reference and the procedure it intends for the successful contractor to follow in this regard⁶.

Both NeuStar and Verizon Wireless suggest adding specific neutrality criteria to the requirements document⁷. It is Telcordia's view that the neutrality criteria outlined in the Commission's rules are clear; however, Telcordia supports referencing the neutrality rules in the requirements document. The Commission may wish to consider adding a requirement for the contractor to provide a plan, as suggested by Verizon Wireless, for ensuring compliance with the Commission's rules in this area. Additionally, Verizon Wireless asks the Commission to "incorporate more specific neutrality guidelines into the Requirements Document that should

⁵ *Comments of NeuStar, Inc.*, July 2, 2002 (pp. 6-9) and *Comments of SBC Communications, Inc.*, July 2, 2002 (pp. 1-2)

⁶ *Comments of Telcordia Technologies*, July 2, 2002 (p. 7, p.33), and *Comments of NeuStar, Inc.*, (pp. 14-15). *Comments of Verizon Wireless*, July 2, 2002 (p. 13) also mention the missing reference.

⁷ *Comments of NeuStar, Inc.*, (p. 13) and *Comments of Verizon Wireless*, (pp. 3-6)

confer legal rights to the industry and establish penalties under the NANPA contract.⁸”

However, since the neutrality requirements are detailed in Section 52.12(a) of the Commission rules, it would be inappropriate to modify those requirements in the context of this procurement or to grant Verizon Wireless’ request to confer on the industry unspecified authority to enforce rules that are the province of the Commission. The terms of the procurement, including provisions for violations of the contractor’s neutrality and other requirements, are covered by FAR sections referenced in the solicitation.

Finally, NeuStar rightly points out : "There will occur at times differing interpretations of NANPA’s scope of work and whether a request for NANPA assistance or action falls within the NANPA requirements. Under a FAR contract, the Commission via the Contracting Officer should be involved when these issues arise and make the final determination as to what is included in the NANPA contract.⁹" Telcordia agrees that the Commission has final oversight authority over the NANPA contract, and that it would be helpful to the industry and NANPA for the requirements document to specify a process for clarification and/or dispute resolution in this regard and that the Contract Officer or Contract Officer’s Representative could serve as a single point of contact. NeuStar also notes that the NANC currently performs an annual performance review, and Telcordia also supports the continuation of this as a mechanism to provide the NANPA with performance feedback from the public, industry and state regulators.¹⁰ The results of this survey could then be used by the Contract Officer as part of the contract performance review under FAR.

⁸ *Comments of Verizon Wireless*, (p. 6)

⁹ *Comments of NeuStar*, (p.4)

¹⁰ *Comments of NeuStar*, (p.3)

In conclusion, as the Telcordia request for significant additional information regarding the property that will transfer to a successful bidder is supported by all potential competing bidders and several service providers, and Telcordia's other requests for further clarification and changes to the requirements document appear unopposed, the Commission should take account of these comments in formulating the solicitation for the new NANPA term.

Respectfully submitted,

TELCORDIA TECHNOLOGIES

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CERTIFICATE OF SERVICE

CC Docket 92-237, CC DOCKET 99-200

I, Louise L. M. Tucker, do hereby certify that on the 9th day of July, 2002, a copy of the foregoing document entitled "Reply Comments of Telcordia Technologies" was served electronically and/or via postage prepaid US first class mail on the parties below:

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